

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re: Bair Hugger Forced Air Warming
Devices Products Liability Litigation

MDL No. 15-2666 (JNE/DTS)

This Document Relates To:
All Actions

**DECLARATION OF BENJAMIN
W. HULSE IN SUPPORT OF
DEFENDANTS' RESPONSE TO
PLAINTIFFS' OBJECTION TO
MAGISTRATE JUDGE'S ORDER
BARRING PLAINTIFFS' NEW
GENERAL CAUSATION EXPERT
OPINIONS**

Under 28 U.S.C. § 1746, I, Benjamin W. Hulse, hereby declare as follows:

1. I am an attorney at the law firm of Blackwell Burke P.A., and one of the attorneys representing 3M Company ("3M") and Arizant Healthcare Inc. ("Arizant") (collectively "Defendants") in this litigation. I submit this declaration in support of Defendants' Response to Plaintiffs' Objection to Magistrate Judge's Order Barring Plaintiffs' New General Causation Expert Opinions. Unless otherwise stated, the facts set forth herein are based upon my personal knowledge, information, and belief.

2. Attached as Exhibit A is a true and correct copy of the transcript for the motions hearing held in this matter on September 6, 2018.

3. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Minneapolis, Minnesota, this 18th day of October, 2018.

s/Benjamin W. Hulse
Benjamin W. Hulse